



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**EDCV22-02267-RSWL(DFM)**

Ismail Mora

(Name of Plaintiff)

P.O. Box 3456 Corcoran CA, 93212

(Address of Plaintiff)

(Case Number)

vs.

COMPLAINT

Sheree Williams, Zachery  
Reynoso, Mr. Placito, County  
of Riverside, John Doe Sheriffs etc.

(Names of Defendants)

I. Previous Lawsuits:

A. Have you brought any other lawsuits while a prisoner: ☐ Yes ☒ No

B. If your answer to A is yes, how many?: N/A Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff N/A

Defendants N/A

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT  
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

Rev'd 5/99

2. Court (if Federal Court, give name of District; if State Court, give name of County)

N/A

3. Docket Number

N/A

4. Name of judge to whom case was assigned

N/A

5. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit

N/A

7. Approximate date of disposition

N/A

## II. Exhaustion of Administrative Remedies

A. Is there a grievance procedure available at your institution?

☒ Yes

☐ No

B. Have you filed a grievance concerning the facts relating to this complaint?

☒ Yes

☐ No

If your answer is no, explain why not

C. Is the grievance process completed?

☐ Yes

☒ No

Nobody responded to my grievance

## III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item B for the names, positions and places of employment of any additional defendants.)

A. Defendant

Sheree Williams

is employed as

Riverside

Sheriff

at

Riverside county Jail

B. Additional defendants

Zachery Reynoso is employed as a Riverside Sheriff at Riverside county Jail. Mr. Placito is employed as a Riverside Sheriff at Riverside county Jail. A deputy involved in my claim is or was working at Riverside County Jail.

## IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

I was attacked and retaliated against multiple times in jail. Specifically, Deputy Williams, Reynoso, and Placito falsified reports and gave false testimony. Deputy Reynoso punched me when I was on the ground defenseless on 12-30-2019. Months later while in AD-seg, Deputies unknown threw a tear gas bomb in my cell while I was sleeping with no verbal warning or directives. This was on 06-26-2020 my 21<sup>st</sup> birthday. I was dragged out the cell after I cutted up and my clothes were cut off. I was then placed in a suicide cell even though I wasn't suicidal at the time.

## V. Relief.

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

I would like the court to give me monetary compensation for my hardships. I went through cruel and unusual punishments and there was a series of events that took place to which I grieved and never did I receive help or get a resolution to my grievences. I still have post-traumatic stress-disorder episodes at night and mental breakdowns. This is why I may not be able to hold a job in the future. I am asking for 1 million dollars.

Signed this 11 day of December, 2022.

Ismael Mora

(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

12-11-2022

(Date)

Ismael Mora

(Signature of Plaintiff)

CORCORAN STATE PRISON

NAME Ismail Mora

CDCR NUMBER B116614

HOUSING ASU-137

PO BOX 3456

CORCORAN, CA 93212



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STATE PRISON



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Clerk of the US District Court  
3470 Twelfth St.  
Riverside, CA 92501



